

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

PLANNED PARENTHOOD SOUTH
ATLANTIC; BEVERLY GRAY, M.D, on
behalf of themselves and their

CIVIL ACTION

Plaintiffs,

Case No. 1:23-cv-480

v.

JOSHUA STEIN, Attorney General of North Carolina, in his official capacity; TODD M. WILLIAMS, District Attorney (“DA”) for Prosecutorial District (“PD”) 40, in his official capacity; JIM O’NEILL, DA for PD 31, in his official capacity; SPENCER B. MERRIWEATHER III, DA for PD 26, in his official capacity; AVERY CRUMP, DA for PD 24, in her official capacity; JEFF NIEMAN, DA for PD 18, in his official capacity; SATANA DEBERRY, DA for PD 16, in her official capacity; WILLIAM WEST, DA for PD 14, in his official capacity; LORRIN FREEMAN, DA for PD 10, in her official capacity; BENJAMIN R. DAVID, DA for PD 6, in his official capacity; KODY H. KINSLEY, M.P.P., Secretary of the North Carolina Department of Health and Human Services, in his official capacity; MICHAUX R. KILPATRICK, M.D., PhD., President of the North Carolina Medical Board, in her official capacity, on behalf of herself, the board and its Members; RACQUEL INGRAM, PhD., R.N., Chair of the North Carolina Board of Nursing, in her official capacity, on behalf of herself, the Board and its members; and their employees, agents, and successors,

Defendants.

NOTICE OF SPECIAL APPEARANCE OF HELENE KRASNOFF

Pursuant to Local Rule 83.1(d), the undersigned counsel hereby provides this Court with notice of the special appearance in the above-captioned civil action of Helene Krasnoff, and in support thereof, the undersigned counsel states as follows:

1. Helene Krasnoff is a licensed attorney in good standing of the bar of the state of New York (Bar # 2876001) and the District of Columbia (Bar # 460177). She has also been admitted to the bars of the U.S. Courts of Appeals for the Fourth, Fifth, Sixth, Eighth, Ninth, and Tenth Circuits and the U.S. District Court for the District of Columbia. She is the Vice President of Public Policy Litigation and Law at Planned Parenthood Federation of America, 1110 Vermont Ave., Washington, DC 20005, and may be reached at 202-973-4800 and helene.krasnoff@ppfa.org.
2. Mrs. Krasnoff agrees that she will be responsible for ensuring the presence of an attorney who is familiar with the case and has authority to control the litigation at all conferences, hearings, trials, and other proceedings, and that she submits to the disciplinary jurisdiction of the Court for any misconduct in connection with this litigation.

WHEREFORE, notice of the special appearance of Helene Krasnoff is hereby provided to this Court. The undersigned counsel asks that she be noted as counsel of record for Plaintiff Planned Parenthood South Atlantic in this proceeding.

RESPECTFULLY SUBMITTED this 20th day of June, 2023.

/s/ Kristi Graunke

Kristi Graunke
ACLU of North Carolina
P. O. Box 28004
Raleigh, NC 27611-8004
(919) 354-5066
kgraunke@acluofnc.org

COUNSEL FOR PLAINTIFFS

/s/ Helene Krasnoff

Helene Krasnoff
Planned Parenthood Federation of
America
1110 Vermont Ave.
Washington, DC 20005
202-973-4800
helene.krasnoff@ppfa.org

COUNSEL FOR PLANNED
PARENTHOOD SOUTH ATLANTIC

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of June, 2023, I electronically filed the foregoing NOTICE OF SPECIAL APPEARANCE with the clerk of court by using the CM/ECF system, which will send a notice of electronic filing.

/s/ Kristi Graunke

Kristi Graunke
ACLU of North Carolina
P. O. Box 28004
Raleigh, NC 27611-8004
(919) 354-5066
kgraunke@acluofnc.org

COUNSEL FOR PLAINTIFFS